



Friends of the
Desert Mountains

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November 14, 2008

California Energy Commission
Attention: Clare Laufenberg Gallardo
claufenb@energy.state.ca.us
1516 Ninth Street, MS 46
Sacramento, CA 95814

Dear Ms. Gallardo:

The Friends of the Desert Mountains is a 501(c)(3) non-profit conservation organization that acquires land in the Coachella Valley area and also functions as the primary support organization for the Santa Rosa and San Jacinto Mountains National Monument. We currently own more than 13,500 acres of conservation land, and have been involved over the years with the acquisition of more than 30,000 acres.

We have reviewed the October 2008 Phase 1B Draft Report of the Renewable Energy Transmission Initiative, including the maps of the proposed Competitive Renewable Energy Zones (CREZ), and we have the following comments:

1. The CREZ maps show a trunk line proposed in the southwest portion of the Coachella Valley. The approximately east-west alignment portion of this runs through the Santa Rosa Mountains along the approximate alignment of Martinez Canyon. This route should be eliminated from further consideration because it traverses the Santa Rosa Mountains Wilderness, managed by the Bureau of Land Management (BLM). The alignment also traverses the Santa Rosa and San Jacinto Mountains National Monument, where the Wilderness is located, as well as a Conservation Area designated in the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Communities Conservation Plan (MSHCP/NCCP), recently permitted by the California Department of Fish and Game and the U. S. Fish and Wildlife Service. This area is also critical habitat for the endangered Peninsular bighorn sheep and contains significant cultural resources. The Friends has acquired many hundreds of acres of land in this area to protect these conservation values. It is absolutely unacceptable that these lands and the Wilderness, National Monument, Conservation Area, and critical habitat of which they are a part would be impacted by construction of a trunk line.
2. The maps also designate an extensive CREZ in the northwest portion of the Coachella Valley. Portions of this are in the Santa Rosa and San Jacinto Mountains National Monument and in Conservation Areas designated by the MSHCP/NCCP, as well as in the BLM Whitewater River Area of Critical Environmental Concern, and in the San

3. Gorgonio Wilderness administered by the BLM. The CREZ boundaries should be redrawn to eliminate areas in any of these designations, except those specific areas where existing facilities already occur. In this instance, it may be acceptable for these facilities to be upgraded within their existing footprints. No new facilities, however, should be designated in these areas. The Friends and other non-profit conservation organizations, as well as state agencies such as the Coachella Valley Mountains Conservancy, and federal agencies such as the BLM, have expended millions of dollars in state, federal, and private conservation funds to protect these areas. CREZ facilities should not be allowed to degrade the conservation values for which so much money has already been expended to protect.

The Friends believes that the following principles should be adhered to in the effort to designate areas for renewable energy development and transmission: -

- The CREZ (Competitive Renewable Energy Zones) should not provide for new facilities that impact state or federal areas previously set aside to protect significant biological, cultural, and other resource values of state and national significance. These include Wilderness Areas, National Monuments, National Parks, State Park, and Areas of Critical Environmental Concern. Tens of millions of dollars of local, state, federal, and private funds have been expended to acquire land for these areas and to manage it. The designation of CREZ should not be allowed to negate or reduce the value of these huge investments by allowing or contemplating new facilities in these areas. Where existing facilities occur in an area, they may be considered for upgrading within their existing footprints.
- The state of California and local governments in many areas have expended significant dollars and invested many years to develop Natural Community Conservation Plans (NCCPs) under the state's Natural Community Conservation Plan Act and Multiple Species Habitat Conservation Plans (MSHCPs) under Section 10 of the federal Endangered Species Act. These NCCPs and MSHCPs facilitate development in appropriate areas and balance that with commitments to conservation in other areas. Proposed CREZ should not impact areas designated for Conservation under an NCCP/MSHCP as this could undermine an NCCP/MSHCP and cause non-compliance with it. This would be devastating after the many years of effort and significant monetary investments by local governments, California Department of Fish and Game, and the U.S. Fish and Wildlife Service to prepare and implement these plans. Where existing facilities, such as transmission corridors, occur in an area, they may be considered for upgrading as these facilities were identified and their impacts considered in the NCCP/MSHCP.

Sincerely,



Buford Crites
Vice-President

cc: Michael Chrisman, Resources Secretary
Karen Scarborough, Deputy Secretary
Don Koch, Director, California Department of Fish and Game
Kim Nicol, California Department of Fish and Game
Mike Pool, BLM State Director
Steve Borchard, BLM District Director
John Kalish, BLM Area Manager
Ren Lohofener, Regional Director, USFWS
Jim Bartel, USFWS Operations Manager, Carlsbad Office
Roy Wilson, Riverside County Board of Supervisors
Marion Ashley, Riverside County Board of Supervisors
John Wohlmuth, Executive Director, Coachella Valley Association of Governments
Katie Barrows, Coachella Valley Association of Governments
Richard Kite, Chairman, Coachella Valley Conservation Commission